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October 26, 2021

**TO: Los Angeles County Citizen's Redistricting Commission**  
**FROM: Resource Conservation District of the Santa Monica Mountains**  
**RE: Redistricting of County Supervisorial Districts**

Dear Commissioners of the Citizens Redistricting Commission:

For over 60 years, the Resource Conservation District of the Santa Monica Mountains (RCDMM), a legal subdivision of the State of California, has been a non-regulatory reviewing and resource agency in the Santa Monica Mountains and Upper Los Angeles River watersheds. We appreciate the opportunity to provide input related to the proposed re-districting of Los Angeles County. Over the last half-century we have identified and stewarded a number of important "Communities of Interest" (COI) that bind the Santa Monica Mountains Watersheds in a single, local community of interest. We ask that the communities of the Santa Monica Mountains, their watersheds flowing into the Santa Monica Bay and Pacific Ocean, as well as the adjacent watersheds of the Simi Hills and upper Los Angeles River system, be represented to the greatest extent possible in unified supervisorial districts.

The Santa Monica Mountains local community of interest is bounded by:

- The Conejo Grade/Thousand Oaks (just west of the Ventura/Los Angeles County boundary) in the northwest;
- Point Mugu (also west of the Ventura/Los Angeles County boundary) in the southwest;
- The Pacific and Santa Monica Bay coastline, including the cities of Malibu and Santa Monica in the south-southeast;
- The Upper Los Angeles River watershed side of the Santa Susana Pass, including Chatsworth and Bell Canyon Communities (that latter at the Ventura County line) in the north; and
- Extends along the spine of Mulholland Drive, north to the 101 Freeway, as far to the east as Runyon Canyon, West Hollywood.

The municipalities and wholly contained unincorporated communities of the Santa Monica Mountains include: portions of the city of Thousand Oaks, city of Simi Valley, Hidden Valley, and Deer Creek, Yerba Buena and Bell Canyons (all of Ventura county); the entirety of Westlake Village, Agoura Hills, Calabasas, Hidden Hills, Monte Nido, Cornell, Malibu Lake, Malibu, Topanga, Pacific Palisades, Santa Monica, Bel Air, Beverly Glen, and the foothill mountain portions of West Hills (west of Valley Circle Blvd), Woodland Hills, Encino and

Sherman Oaks (south of Ventura Blvd), Westwood, and the Canyon Areas of Beverly Hills and West Hollywood (north of Sunset Blvd and Franklin Ave) in Los Angeles County. All of these communities of interest link natural and human communities with one another in a manner unique to mountain watersheds, and have multiple common resource interests, including:

**Watersheds:** Watershed boundaries are real geographic features that directly impact the movement of water and wildlife, and in form the underpinning of local ecology. Watersheds in this way create the underlying community of interest for both human and non-human residents. Municipal jurisdictional boundaries that misalign with watershed boundaries set the stage for numerous management conflicts that can be avoided by keeping watersheds as intact as possible within the political process.

**Water Quality:** Seen from a practical and watershed perspective, what happens upstream affects what happens downstream. From a regulatory framework, the impacts of inter-mountain communities and their responsibility for both point and non-point pollution is shared throughout watersheds. Water quality is a tremendous concern in the Santa Monica Mountains, as it is throughout the state. Providing political entities that are responsible for the whole of a river or creek system, rather than fragmenting it, is both practical and positive.

**Wildland-Urban Interface (WUI) Wildfire Management:** The Santa Monica Mountains define the edge of dense urban development in the San Fernando Valley and along the coast, and include numerous communities and neighborhoods within the mountains themselves. Many municipalities, such as Malibu and Calabasas in Los Angeles County, Westlake Village (with contiguous development straddling both Los Angeles and Ventura Counties) and Thousand Oaks of Ventura County, cover both wildland in the upper reaches of their watersheds, and adjacent valley areas in the lower reaches. The interface with natural areas defines a number of shared interests, foremost among them wildfire management. For communities residing within the mountains, balancing the management of seasonal wildfire threat with the conservation of scenic, recreational, and wildlife values is a common concern. Less than three years ago, the Woolsey Fire tragically demonstrated this “Fire-shed” and “Wind-shed” community of interest, burning from an ignition point just southwest of the Santa Susana Pass to the ocean in a few days, driven by Santa Ana winds that yearly blow through these Santa Monica Mountains and Simi Hills communities of interests. Every municipality and incorporated community of the Santa Monica Mountains located south and inclusive of West Hills, and west and inclusive of Calabasas to the Ventura County line and beyond, suffered home losses, with 1600 buildings destroyed and nearly 100,000 acres of critical habitat burned.

**Transportation Corridors:** While some see the Santa Monica Mountains as a division between the San Fernando Valley and the coast, in fact, the through-mountain roads, as well as the creeks and rivers, provide critical connections that create a community of interest on both sides of the mountains. Thousands of daily commuters rely upon the 101, 5, and 10 freeways, Kanan Rd., Malibu Canyon Rd., and Topanga Canyon Blvd. in the west, as well as

the 405 freeway, Sepulveda, Laurel Canyon and Coldwater Canyon Roads in the central portion of the mountains to get to and from their homes and work. In addition, these corridors also provide wildlife linkages used by everything from fish (including federally endangered southern steelhead trout) to mountain lions (now listed by the State as a locally endangered population). Incorporating these transportation corridors into a single political unit facilitates and focuses scarce resources most effectively.

**Scenic and Recreational Resources:** As the hub of recreation for a densely populated urban area, the Santa Monica Mountains are a critical resource for a region that expands well beyond its immediate boundaries. Millions of visitors from near and far utilize the mountains and its watersheds from the upper Los Angeles River watersheds on the north and east, to the Pacific and Santa Monica Bay watersheds on the south and west. From a recreational perspective, the flow of people whose quality of life is sustained by the mountains and beaches follows its watersheds.

**Wildlife Habitat:** The Santa Monica Mountains are home to numerous rare flora and fauna that both benefit and are threatened by watershed-based influences. Invasive species must be managed from a whole-watershed perspective, as weeds in particular will reseed downstream if sources upstream are not managed. Connectivity at the regional scale is also critical. The mountains' apex predator, the mountain lion, relies entirely on linked and fragile watershed connections from the Santa Monica Bay and Pacific Ocean on the south, through the upper Los Angeles watersheds of the Simi Hills to source populations in the Los Padres National Forest. If this community of interest—which includes human residents who value such complete ecosystems—were not maintained, the genetic health of this animal would not be sustainable within the Santa Monica Mountains. Currently, an 80 million dollar public and philanthropic investment supported by literally hundreds of individual donors, is scheduled to break ground at the end of 2021, and will result in the largest and most costly habitat linkage structure in the world.

Shared interests in this region have led to the creation of numerous cooperative agreements and administrative overlays, including the Malibu-Las Virgenes Council of Governments, and most notably, the critical open space network of the Santa Monica Mountains National Recreation Area (SMMNRA), managed by the National Park Service in cooperation with California Department of Parks and Recreation, and the Santa Monica Mountains Conservancy/ Mountains Recreation and Conservation Authority. The RCDSMM is the fourth element of this regional natural resource community of interest that stretches from Ventura County's Point Mugu in the west and Santa Susana Pass in the north, to Los Angeles County's Santa Monica in the south and Runyon Canyon in the east, and is uniquely chartered to work with private owners within these watersheds on a voluntary basis. In recognition of this two-county community of interest, the RCDSMM was granted funding from the State Department of Conservation to organize the Santa Monica Mountains Watersheds Council, including the upper Los Angeles River tributaries that drain the north slope of the Santa Monicas.

To date, the collection of watersheds that define the communities of interest described above and shown in the attached maps has benefited by a relatively un-fragmented overlay of county and state representation. Future redistricting should seek to keep the communities of the greater Santa Monica Mountains area and their associated watersheds whole within single representational districts to the greatest extent possible. Adhering to the following principles when defining supervisorial districts would maintain or enhance the connectivity of interests that is critical to the health and vitality of our communities:

1. Emphasize continuity of watershed form and habitat linkages. The mountainous portions of the westernmost and southernmost upper Los Angeles River watershed—the western and southern portions of the so-called “Rim of the Valley” areas—should be grouped in a single community of interest with the coastal areas that drain from the Santa Monica Mountains.
2. Identify and work with existing land management overlays so that the communities of interest they represent are kept intact. The Santa Monica Mountains National Recreation Area represents such an administrative overlay.
3. Understand and respect that large and connected areas of open space, although not in and of themselves sources of significant human populations, bind significant adjacent populations in a strong community of interest, and so fragmentation of these areas and communities should be avoided.

The Third District as currently configured has been very beneficial for our Santa Monica Mountains COI, and so recommend that any redistricted boundaries of the Third District remain similar. However, to the extent that population or demographics dictate some reconfiguration, this could best be accomplished by continuing to incorporate the COI in a district with other Santa Monica Mountains communities along the coast and adjacent like Pacific Palisades and inland by simply following the Santa Monica Mountains eastward. As described above, these communities share many of the same issues -- including *wildfire connectivity* -- and are nestled in canyons and on hillsides, sharing the same natural environment and mountainous or mountain/coastal landscape. When a wildfire starts in the Brentwood portion of the mountains as it previously has, for example, concerns are always that it will burn west and south toward the sea, along and through the mountains to Pacific Palisades and into Topanga and the SMMNRA. When a fire started this spring in the SMMNRA in Topanga State Park, it burned through to the Palisades—even under favorable wind conditions.

These Santa Monica Mountains communities are part of the WUI -- Wildland Urban Interface -- and have advocated *as a common community of interest* for protective resource policies for wildlife and connectivity. They all live interconnected with open space and protected parkland, and steward these lands collectively. This common interest, represented to date by 3<sup>rd</sup> District Supervisors, has not only benefitted those who live within them, but also protected the public values of the land such as wildlife and water quality, and the public recreational values for the millions who share this landscape as visitors each year

For all of the above reasons, the Resource Conservation District of the Santa Monica Mountains recommends that the Santa Monica Mountains COI remain unfragmented in a single district with its watersheds draining both north and east to the upper LA River tributaries and south and west to the Santa Monica Bay, preserving the critical habitat connectivity to and through the Simi Hills toward the Santa Susana Mountains. This community and its natural and cultural resources would be best served in a similarly drawn Third Supervisorial District.

Thank you for the opportunity to submit our comments in the redistricting process. We look forward to participating as the work progresses. Should you have any questions regarding the content of this letter, or would like to more directly engage the RCDSMM, please feel free to contact me directly, using the contact information provided on this letter.

Respectfully submitted,



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Executive Officer

cc: Joseph T. Edmiston, FAICP, Executive Director, Santa Monica Mountains Conservancy  
David Syzmanski, Superintendent, Santa Monica Mountains National Recreation Area